

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DONALD DEAN JOHNSON,	:	Civil Action No. 11-cv-06341-PAC
	:	
Plaintiff,	:	<u>CLASS ACTION</u>
	:	
vs.	:	LEAD PLAINTIFFS' NOTICE OF MOTION
	:	AND UNOPPOSED MOTION FOR
SEQUANS COMMUNICATIONS S.A., et al.,	:	PRELIMINARY APPROVAL OF
	:	SETTLEMENT
Defendants.	:	
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Settlement Agreement with exhibits, and all prior pleadings and proceedings had herein, Lead Plaintiffs, by and through their attorneys, hereby move the Court, before the Honorable Paul A. Crotty, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order (1) granting preliminary approval of the proposed Settlement; (2) approving the form and manner of giving notice of the proposed Settlement to the Class; and (3) setting a hearing date for final approval thereof, and a schedule for various deadlines relevant thereto.

DATED: November 7, 2013

Respectfully submitted,

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& DOWD LLP
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s/ Ellen Gusikoff Stewart

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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 7, 2013.

s/ Ellen Gusikoff Stewart

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Manual Notice List

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